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April 22, 2022

**Via ECF**

Hon. Thomas J. McAvoy  
Senior U.S. District Judge  
Federal Building & U.S Courthouse  
15 Henry Street  
Binghamton, NY 13901

Re: United States v. Delaney  
1:20-CR-000335-TJM  
*Request to Seal Certain Portions of Sentencing Memo and Supporting Exhibits*

Dear Judge McAvoy,

I represent the defendant, Jacob Delaney, in the above matter. Today I am filing the defendant's sentencing memorandum and supporting materials. These materials refer to sensitive personal issues and mental health treatment and counseling findings. As a result, the defendant moves to submit the redacted portions which discuss and/or substantiate the same. Specifically we request that the redacted portions of his sentencing memorandum and Exhibit B be filed under seal and the entirety of Exhibits A, C, and D also be filed under seal. We make this motion pursuant to FRCP 49.1(e) and Local Rule of Criminal Procedure 49.2(b) and *Lugasch v. Pyramid of Onondaga County*, 435 F. 3d 110, 119-27.

I previously advised the Government regarding this request and they have no objection. Unredacted copies of the same will be sent confidentially to chambers and the Government by email.

Thank you for your attention to this matter.

Respectfully,

Iseman PLLC

By:



Scott Iseman  
Attorney

Encl.

cc: All parties via ECF